
From: David Mayer
Sent: Friday, April 16, 2021 11:37 AM
To: Richardson, Clark (SHB)
Cc: Reed Martens
Subject: RE: GEICO Gen. Ins. Co., et al. v. M.O. & M.B. - request to waive service of summons

Clark

We would have been happy to discuss this matter with you prior to filing a lawsuit. We just became aware of you initiating legal action and you never tried to reach out to us.

Our position is that [M.B] transmitted HPV to our client when they first began to perform sexual activities in [M.B.'s] automobile in Nov and Dec of 2017. We believe the underlying GEICO policy provides coverage. The sexual activity took place in Missouri.

We do not believe that the umbrella policy applies so not sure why you added the umbrella policy to your lawsuit.

Happy to discuss this with you.

David

David Mayer

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From: Richardson, Clark (SHB) <WRICHARDSON@shb.com>
Sent: Thursday, April 15, 2021 2:16 PM
To: David Mayer <dmayer@monseesmayer.com>; Reed Martens <rmartens@monseesmayer.com>
Subject: GEICO Gen. Ins. Co., et al. v. M.O. & M.B. - request to waive service of summons

David & Phillip,

As outside counsel for GEICO, we're in receipt of your attached 2/25 demand letter. For GEICO's recently filed declaratory action related to this matter, please consider this e-mail and its attachments a request for you to agree to waive service on behalf of your client, per Federal Rule 4(d). Otherwise, GEICO may seek to recoup the expenses attendant to personally serving your client. Thanks.

W. Clark Richardson

Associate

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